

**OFFICE OF ENTERPRISE COMPLIANCE  
QUARTERLY REPORT ON 2011 PLANNED ACTIVITIES  
FIRST QUARTER**

**I. INVESTMENTS BUSINESS LINE****Activities and Goals for the Upcoming Year and Current Status**

|      | Planned Activity   | Target Date    | Q1 11 | Q2 11 | Q3 11 | Q4 11 |
|------|--|----------------|-------|-------|-------|-------|
| I-1  | ECOM will continue to review and revise the Investment CAM desk procedures.  | Ongoing        | ●     |       |       |       |
| I-2  | ECOM and INVO will continue to research and review available automated tools for commodity and investment compliance.  | Ongoing        | ●     |       |       |       |
| I-3  | ECOM will conduct the 4th Annual Real Estate Compliance Review.  | Ongoing        | ●     |       |       |       |
| I-4  | ECOM will continue to actively participate in REU Staff Internal Procedures Manual sessions.   | Ongoing        | ●     |       |       |       |
| I-5  | ECOM will continue to research and review best practices to provide to the REU.  | Ongoing        | ●     |       |       |       |
| I-6  | ECOM will continue to monitor and report Fixed Income and Global Equity compliance violations.   | Ongoing        | ●     |       |       |       |
| I-7  | ECOM will conduct a Securities Lending review.   | Ongoing        | ●     |       |       |       |
| I-8  | ECOM will conduct a Commodities review.  | Fourth Quarter | ●     |       |       |       |
| I-9  | ECOM will conduct an AIM review.   | Ongoing        | ●     |       |       |       |
| I-10 | ECOM and INVO will partner to help ensure staff compliance with the Insider Trading Policy.  | Ongoing        | ●     |       |       |       |
| I-11 | ECOM and INVO will perform ongoing monitoring of the Corporate Governance automated proxy voting platform and conducting periodic review of proxy voting records and trends. | Ongoing        | ●     |       |       |       |

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**II. Health Business Line**

**Activities and Goals for the Upcoming Year and Current Status**

|            | Planned Activity  | Target Date | Q1 11 | Q2 11 | Q3 11 | Q4 11 |
|------------|---|-------------|-------|-------|-------|-------|
| <b>H-1</b> | ECOM will continue to identify applicable laws, rules, regulations, and policies that apply to the health business line, and coordinated with HBB to identify compliance needs. | Ongoing     | ●     |       |       |       |
| <b>H-2</b> | ECOM will continue to research tools and best practices to monitor and report on compliance activities in the health business line.   | Ongoing     | ●     |       |       |       |
| <b>H-3</b> | ECOM will continue to provide education and outreach through compliance and ethics training for HBB staff.  | Ongoing     | ●     |       |       |       |

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**III. Pension Business Line**

**Activities and Goals for the Upcoming Year and Current Status**

|            | Planned Activity  | Target Date | Q1 11 | Q2 11 | Q3 11 | Q4 11 |
|------------|---|-------------|-------|-------|-------|-------|
| <b>P-1</b> | ECOM will continue the creation of monitoring and reporting tools for pension and retirement compliance.  | Ongoing     | ●     |       |       |       |
| <b>P-2</b> | ECOM will continue to engage in outreach to provide MBSB staff with improved compliance-related tools, resources, and assistance.                                   | Ongoing     | ●     |       |       |       |
| <b>P-3</b> | ECOM will continue to work with the pension business line to assess risk of noncompliance with policies, rules, and regulations and determine compliance exposures. | Ongoing     | ●     |       |       |       |
| <b>P-4</b> | ECOM will continue to provide education and outreach through compliance and ethics training for Pension staff.  | Ongoing     | ●     |       |       |       |

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**IV. ENTERPRISE BUSINESS LINE**

**Activities and Goals for the Upcoming Year and Current Status**

|     | Planned Activity  | Target Date | Q1 11 | Q2 11 | Q3 11 | Q4 11 |
|-----|---|-------------|-------|-------|-------|-------|
| E-1 | ❖ ECOM will assist with efforts to implement recommendations from the Special Review on Placement Agents.   | Ongoing     | ●     |       |       |       |
| E-2 | ❖ ECOM will administer the CalPERS Internal Form 700, Annual Statement of Economic Interests Process.   | Ongoing     | ●     |       |       |       |
| E-3 | ❖ ECOM will continue to administer the Form 700 Enhanced Review Process, to help ensure CalPERS staff complies with laws, regulations, and policies governing disclosure and incompatible activities.                                 | Ongoing     | ●     |       |       |       |
| E-4 | ❖ ECOM, in coordination with FCSD and PAOF, will publish Form 700 disclosure statements and the Travel Information Summaries on the CalPERS webpage for Board members and representatives, Executive Staff, and key investment staff. | Ongoing     | ●     |       |       |       |
| E-5 | ❖ ECOM, in partnership with OSSD, will monitor consultant disclosures as required in the CalPERS Contract-Related Disclosure Requirements Policy.   | Ongoing     | ●     |       |       |       |
| E-6 | ❖ ECOM will continue to monitor the CalPERS Ethics Helpline and report to the Finance Committee.  | Ongoing     | ●     |       |       |       |